

Question & Answer Session

CWNS 2008 Training: Documenting Stormwater Needs

October 23, 2007

The first section of this document is an edited transcript of the questions and answers that were provided during the Web Seminar Q & A sessions. Some answers include additional information and/or clarification. The second section contains answers to questions that we were unable to answer during the live webcast.

Section I:

Q: What are the specific funding mechanisms (e.g., 319(h), SRF) for which the needs information will be used to provide funding to local governments?

A: The needs information has no direct tie to any funding program; there are no guarantees for funding. There is no way to apply for funding directly from the CWNS data entry system and there are no grant programs directly associated with CWNS.

Basically, the general tie between the CWNS Report to Congress and funding is that the Clean Water Act authorizes Congress to allocate the CW SRF program using the needs survey. So, Congress has the authority to use the data in that manner, and it has not done that as of yet. There is a bill in Congress now that would allocate a portion of the CWSRF to the States based on what they report in the needs survey. Additionally, the needs information that the local government submit help the States develop their priority list for the SRF. Other than that, what we are trying to stress is reporting needs in the needs survey requires you to get documentation, organize your thoughts, and make estimates of what you need. For local governments, that information is needed to get funding, whether that funding is from 319, taxes, increased rates, bonds, or Federal grants. So, there is no specific funding. It prepares you to go out and get money for your capital projects for your community.

Clarification: One of the major benefits of participating in the Needs Survey is that the information that communities gather to document their needs may be used to develop applications for 319(h) grants, SRF loans, or other sources of federal, state, and local funding.

Q: The biggest incentive to participate in this program, in my mind, is to obtain more revenue to operate and maintain storm water controls. Is this a realistic expectation?

A: As soon as you turn in your needs information, you won't get a check back. That would be an unrealistic expectation, but the documentation in the survey can be used in a number of ways to get funding from various sources including the State Revolving Fund Program and 319 NPS grant program. Also, it can also be very helpful to a stormwater utility for planning its capital expenditures that it funds. There are also a wide variety of other grant sources out there. The community Block Grant program is one that sometimes funds water infrastructure. There is a wide variety of uses for this data. It will be helpful to use it in soliciting funding, but don't assume you will get automatic funding. There is no dedicated national stormwater funding source or grant program at this time.

Q: How is the survey used to impact/shape stormwater policy?

A: We hope that as we gather more stormwater needs we will have a better basis for making policy decisions. Right now, there is actually a bill before Congress asking for some grants for stormwater projects, but we would certainly be bolstered in making an argument for such proposals if we had better information in CWNS. In addition, internally in EPA, we anticipate using this data to track and evaluate the different kinds of projects that will be implemented in stormwater. That is the reason for the new subcategories. We will be looking at traditional stormwater-type of projects, as well as some of the newer infrastructure projects. There is a number of ways that we anticipate using this information for programmatic and policy purposes. This information could be very useful in enforcement cases, for finding projects that we might do in lieu of fines and penalties.

Clarification: The information in the Needs Survey could also be used by the NPDES program to help analyze trends in the needs for different types of stormwater BMPs. It would also be useful to support the major program evaluation the Agency must do of the stormwater program in 2011.

Q: Will slides be available, and how will we be able to access the slides?

A: The slides will be available on the Website at <http://www.epa.gov/cwns/webseminar.htm>. On that page, you can access recorded sessions, presentations, and the questions and answers documents.

Q: How do we find out who our state coordinator is?

A: A list of the State CWNS Coordinators is on the EPA Website. The Website is <http://www.epa.gov/cwns/whereyoulive.htm>. A list of State Stormwater Coordinators is available at http://cfpub.epa.gov/npdes/contacts.cfm?program_id=6&type=ALL or at <http://www.epa.gov/cwns/cwns2008.htm> under the heading Resources.

Q: What is the difference between Storm Water and stormwater (or is it just personal preference)?

A: There is no difference at all. It is just a matter of personal preference. The preference for most is to use it as one word, but there is some regulatory work that uses it as two words.

Clarification: The Clean Water Act says “stormwater.”

Q: Slide 41- What defines an Urbanized Area? Population?

A: Urbanized areas are defined every ten years by the Census Bureau. The Census Bureau identifies high concentrations of population in the U.S., which they call the “urban cores.” Around those urban cores, they then look at the population density. For instance, a city like Cleveland, Ohio is clearly an urban core. Then, the Census Bureau will look at the population density of the areas immediately around Cleveland for anything that is over 1000 people population density per square mile. Any area in the Cleveland Metropolitan area that meets that population density is identified as an urbanized area. EPA decided that communities that have been identified as urbanized areas are included in the phase II program.

Clarification: For more information on this topic, please read the Stormwater Phase II Fact Sheet on urbanized areas, available at: <http://www.epa.gov/npdes/pubs/fact2-2.pdf>

Q: What is GIS and how can it be used in stormwater cleanup?

A: GIS stands for Geographic Information Systems. This is a relatively new and quickly emerging field used for mapping. It allows you to view maps in computers with different data layers. So, any data that

can be tied to a spatial location on a map can be put into a GIS map. Public Health Agencies and natural resource managers use GIS a lot. For stormwater management, GIS maps can show you information related to the geographic points in your storm-sewer system. For example, who lives there, or what facilities are nearby. Especially for illicit discharges, you can map your stormwater outfalls and then add data layers with different types of information to help you better understand and then solve your stormwater pollution problem.

EPA has been encouraging the use of GIS systems to map outfalls and to track of illicit discharge investigations, post-construction BMPs, and inspections. It is similar to keeping track of construction sites. There are multiple uses for this GIS. A lot of the communities are finding out that it is a worth while investment over the long term. It is a reportable capital need.

Q: What is the difference between system rehab and storm sewer rehab?

A: The question refers to slide 35. The system rehabilitation refers explicitly to wastewater pipe rehabilitation. Storm Sewer rehab is for storm sewer rehabilitation.

Clarification: This was a “typo” on the slide. It should have just said “storm sewer rehabilitation.”

Q: Is there a methodology for needs typically introduced by rapid construction/urbanization linked to population growth projections?

A: Localities or States can develop methods for estimating projections. Areas that are experiencing a lot of growth, may have a good reason to develop an estimate for future population growth. For instance you may know the cost for constructing a wet pond or you know the cost per mile for pipes. If you are experiencing a lot of growth in a particular area, you could take some of those numbers and come up with a methodology for what may happen in the future.

This is an example of an area which would be ideal for pre-approval of innovative methodologies. States have submitted such ideas in the 2004 survey. They came up with a lot of really good ideas about how to document some of these unconventional type needs. This is where State Stormwater and CWNS Coordinators can really work together and submit proposals to EPA explaining how the state wants to document these needs, in this example, to justify the growth projections. If you have ideas, contact us at cwns@epa.gov and tell us what your proposed methodology is. The Website has details on the pre-approval methodology procedures at <http://www.epa.gov/cwns/method.htm>.

Q: If your municipality plans to construct a new Township Building, are the required stormwater management facilities a need?

A: Yes. Depending on what practice or practices you are using, your needs could fall under any of the four sub-categories. If you are putting a rain garden it would fall under sub-category C. If you are putting in a ditch, that would be sub-category A, for traditional conveyance. If you are putting in a wet pond to retain the stormwater for a time, that is sub-category B, for traditional treatment.

Q: By not mentioning BMP or projects in your MS-4 Plans, in order to maintain your ability to obtain funding does that encourage basic or non-beneficial MS-4 Plans?

A: You should mention your BMPs and your projects in your MS4 stormwater management plans. We want those to be good, to be thorough stormwater management plans. By including your projects in your

stormwater management plans, you won't eliminate your ability to receive funding. The issue is only whether the State NPDES permitting authority mentioned that specific project in the permit.

Clarification: EPA encourages you to develop a complete and thorough stormwater management plan (SWMP). Most SWMPs go well beyond simply responding to the requirements in the MS4 permit and describe activities that the MS4 believes are important to address water quality issues in their area. The 2003 Section 319 Grant Guidance has detailed information about which activities in MS4s are potentially eligible for grants and which are not. In a nutshell, if the activity is specifically required by the permit, it is not eligible for 319 grant funding. The SRF program does not make such restrictions and MS4 communities can apply for SRF loans for any of their stormwater management projects.

Q: Is A National Estuary Program's Comprehensive Conservation Management Plan (CCMP) action an acceptable documentation?

A: CCMPs are a great source of documentation. One reason why it wasn't mentioned is because they are only applicable in the 28 National Estuary Programs (NEP). They are a very good source of needs because they very clearly outline the plans, and they are usually 4-to10 years out. In terms of costs, it depends on how the CCMP is written. Therefore, we ask people to send them in for review. If you are in a NEP or have an NEP in your state, we encourage you to use your CCMP for documenting needs.

Q: Can needs be reported on watershed scale?

A: In some cases, needs can be reported in a watershed scale. When the best management practices you are suggesting as a solution are throughout the watershed, then yes. Otherwise, no, they can't be reported on a watershed scale.

Q: Does EPA have a limit on the size/scale of the watershed for which a need can be reported? For example, can the watershed be of a size as large as the Chesapeake Bay watershed?

A: Watershed scale BMPs can be accepted for watersheds that are classified as an USGS 9-digit HUC (Hydrologic Unit Code). Larger HUC codes will need pre-approval, so if you interested in reporting needs for a larger watershed go to <http://www.epa.gov/cwns/method.htm> to learn about the pre-approval procedures.

Q: Our community is in the process of developing a stormwater utility fee. We are calculating the fee in part based on our proposed CIP. If these capital needs are proposed to be covered by the new fee, do we report them as "needs?" It seems to me that part of the usefulness of the survey would be to educate Congress of the full cost of these watershed protection mandates, whether or not the municipality is able to fund them.

A: Yes. You can report them as needs. In fact, this is the kind of relationship Nikos talked about before in reference to the Clean Watersheds Needs Survey and stormwater utility and your local capital improvement process. They can all be linked together. Things that you are planning to fund locally can be reported as needs. Needs are not limited to projected that are planned to be financed using federal funds. If you try to fund them through local bonds, or utility fees, or through some other source, they should be reported as needs.

Q: Is the national cost estimate for TMDL development and implementation (by EPA) a valid source of cost information and need identification?

A: The TMDLs are valid for justifying that there is a need, but for the cost we encourage more local sources for costs. It has to be looked on a case-by-case basis. As a general rule TMDLs are acceptable for identifying needs. For the needs justification a TMDL can be used if the project you are documenting relates to one of the reasons why water is impaired.

Clarification: A TMDL can be a good source of information for identifying needs. Once identified, these needs would need to be further documented using more detailed cost information, such as design documents, studies, comparable cost estimates, or other documentation.

Q: What is the acronym TMDL?

A: A TMDL is the Total Maximum Daily Load. It is a program EPA runs to develop standards for waters that have been designated as impaired. For more information visit: <http://www.epa.gov/owow/tmdl/>.

Clarification: A TMDL is developed to address an identified water quality problem in a particular waterbody (river, stream, lake, bay, etc.). The TMDL itself is an allocation of the amount of a particular pollutant that can be discharged without causing a water quality problem. The TMDL generally represents a reduction in the amount of the pollutant that is currently being discharged to a waterbody and the allocation is then incorporated into NPDES permits for point source dischargers or through other means to nonpoint source discharges to achieve that reduction.

Q: Is there any thought of including costs for maintenance, inspection, etc. at some point, as there are many long-term costs associated with capital needs?

A: There are many costs that are associated with operational needs, maintenance, and other capital needs. However, CWNS 2008 will remain limited to capital needs. We are not planning to change the scope of the survey in the future.

Q: Will you take into account sanitary sewer repair needs when they are documented as the source of illicit discharge-related pollution?

A: Yes. In the case of illicit discharge from a sanitary sewer, you may be doing that under your stormwater program, but the need will be reported as a wastewater need. This is how we account for sanitary sewer repair needs within the documentation for CWNS.

Most of your stormwater capital needs will come from the post-construction program. There will be some capital needs associated with other parts of the program. For instance, street sweepers would be associated with the good house-keeping minimum measures. A GIS system might be serve several program under several minimum measures. So, there is a wide variety of places where these needs can come up. They are not only post-construction. Probably, the most easily identified ones are post-construction.

Q: Are smaller Cities, that did not need to apply for an MS4 permit, encouraged to participate in the CWNS? Will there be a potential for grant opportunities for non-MS4 Cities?

A: The small communities that don't require permits are also encouraged to enter needs in CWNS. They will be in the unregulated category, and they can report their needs in the same subcategories (traditional, green infrastructure, etc). In addition, for communities with populations of fewer than 10,000 people, the documentation requirements are less burdensome. For more information on reporting

small community needs, the Best Practices guide for entering Small Community needs at <http://www.epa.gov/cwns/cwns2008.htm> (under the heading Resources).

Q: If the Municipality does not own the land that contains the stormwater BMP or outfall are these facilities considered a part of their MS4 Permit? For example: Home Owner Association, or non-dedicated streets.

A: The answer provided in the webcast was not very clear. See clarification below.

Clarification: Privately-owned lands are not part of the MS4 system, meaning the conveyance system. A regulated stormwater community (Phase I and II) is responsible for addressing stormwater that comes into its system from private (and public) lands. For the purposes of the Needs Survey, communities may also report needs for stormwater projects that will be privately owned. For instance, if a homeowner's association will need to construct a wet pond, those capital costs can be reported as a privately-owned stormwater need under category VI.

Q: Will the needs of military bases be included in the needs survey since they are considered small MS4s? Would this provide help to the bases for justifying funding water needs projects?

A: Original answer: No, military bases will not be included in CWNS 2008. We do not collect need for federal lands.

Clarification: The needs of military bases, as well as all other federal facilities, are tracked in the CWNS database as unofficial needs. These federal facility needs are summarized both in the Report to Congress appendices and on the CWNS web site.

Q: Can land purchases be included?

A: Land purchases can be included if it is integral to the treatment process. Examples are:

- Purchasing an area or easement for stormwater*
- Outright purchase of a stream bank for a preservation area.*

These types of projects can be part of your stormwater management plan.

Clarification: Land purchases may be reported as stormwater capital needs when the primary purpose of the purchase is to address or prevent stormwater problems and the land is integral to the treatment process.

Q: For the data the needs survey is requesting, is it for the four year period (2008-2012?) or longer?

A: No. We are collecting needs as of January 1, 2008, and the period is up to 20 years (December 30, 2027). If you have documentation meeting the CWNS criteria that justify needs for a longer period, then the needs can exceed 20 years. So, the reported needs are not limited to the 2004-2012 period.

Q: If the capital costs are associated with Phase II stormwater permit compliance (not traditionally eligible for CWA funding), should they be included?

A: Yes. They should be included. CWSRF eligibility is not a requirement for reporting needs in CWNS. But in the Needs survey itself, we are looking for all the costs associated with stormwater management in your community. You can report all of those.

Q: Does an authority have to have a MS4 permit to get needs accepted?

A: *No, you don't. If you have not gotten your MS4 permit yet you can still submit your information. There are a very small number of communities where the State has not issued the permit yet. You will still indicate you that are an MS4, regulated under phase II. That would not be a problem at all.*

Q: Can these projects include quantity of stormwater in addition to quality?

A: *A need is for a water quality-related issue, but we also know that many of these types of projects have both water quality and water quantity benefits. So, if you have something that addresses both of these issues, it can be included. If the benefit is strictly water quantity, it cannot be included. As long as it is not strictly for quantity, it can be included.*

Clarification: For instance, the construction of a dam is not, generally, related to stormwater management or water quality. As such, these costs would not be eligible for inclusion in the Needs Survey. See related question in Section II.

Q: What about associated costs -- like design costs, inspection costs, etc?

A: *CWNS is focused on the capital costs associated with basically building something, be it a wet pond, or a sewer pipe, or a bioretention cell. And, it would include the design costs that are associated with putting that project together. What we don't include are maintenance costs, inspections, and things like that. Those kinds of day-to-day operations costs are beyond the current scope of the Needs survey.*

Q: Current documentation is referring to past dates. Can you please explain further?

A: *Yes. The current documentation does refer to past dates. Basically, it says that the need existed as of January 1, 2008. Some of these documents we are discussing are planning documents that have timelines of 10-to-20 years. They may include projects that are still needed, things that have not been funded, or implemented. Something that has been planned, that there is information about, and that has not been funded or implemented is considered a need. Newer, more current documentation may be a more accurate source of data. These are guidelines for accepting the needs into the survey.*

Q: When should the States be ready to start accepting needs reporting? I'm ready now!

A: *The kickoff meeting is in January 2008. States probably need some time to get ready and look at the existing data (from 2004). It will probably be after the end of January. The beginning of February is a good estimate, when States will begin to interact with local users. It will vary from State to State. It is suggested you contact your State's CWNS Coordinator to find out how your State will handle it.*

Clarification: We will soon be following up with the States' CWNS Coordinators to ask them if they want us to post on our National CWNS Website when each State plans to start the interaction with the local communities and start accepting data for the 2008 survey.

Q: How long will it take to get a response to a needs survey application?

A: That varies from State to State. This is a new system for them, and they are exploring the various procedures. We will try to get more information out to the local entities as soon as possible. If you are interested in learning more about how your State is handling this, it is suggested that you contact your State's CWNS Coordinator. The States CWNS Coordinators' information is on our Website at <http://www.epa.gov/cwns/whereyoulive.htm>.

Q: How do you verify the accuracy of the data received?

A: There are several layers of the verification of the data. The first line of verification is at the State CWNS Coordinator level. They look at the data and the documentation. Every need in CWNS is documented, so the States look at the documentation to ensure the data submitted matches the data of the local community. They check to ensure the needs meets the eligibility criteria or whether it should be returned to the local community for further clarification/justification. When the data is submitted to EPA, we have contractors that review the data extensively (both needs and costs) based on the eligibility and documentation criteria. Basically, this is the review process before the data is entered in the Report to Congress.

Q: Why is the 2004 CWNS data not yet available publicly?

A: The 2004 report is not yet available because the Report to Congress has not been approved by the President's Office of Management & Budget (OMB). EPA submitted the report to OMB over one-and-a-half years ago, and they have to approve the Report before we submit it to Congress. As of today, this still has not happened. As a result, EPA cannot share the needs data publicly. Technical data from the 2004 survey is available by contacting cwns@epa.gov. Individual states have access to their own data and have been using it to make decisions within their own states.

Q: Since it has been 3 years since the 2004 report was submitted and it still has not been approved by the OMB, when will the 2008 CWNS be submitted and when is it expected to be approved? Is it only after approval that benefits of the CWNS will be realized?

A: It is a high priority item for our management, to get the 2004 report approved. They have been working hard at it. A lot of their actions are beyond EPA's control. For 2008, we are taking aggressive steps to get our part done quickly, starting with the kickoff. We are starting the survey in January 2008. Past surveys have been started in April or May. We will be doing data collection in January through October 2008, data review and validation in November 2008 through February 2009. And we are scheduled to do our report reviews in March into the summer of 2009. So, this is our high priority to get the 2008 report as soon as possible.

Some of the benefits of CWNS can be realized prior to the release of the Report to Congress. States can use their own data to develop Intended Use Plans (to prioritize SRF funding), inform program development and technical assistance, and make funding and budget decisions. In addition, the technical data that is collected as part of CWNS will be available for use after the data review and validation period (CWNS 2004 technical data is currently available).

Q: What was the level of participation in the last survey?

A: In the 2004 survey, all of the States except Alaska, as well as the District of Columbia and Puerto Rico, participated. In terms of reporting stormwater needs specifically, about thirty States submitted

stormwater needs. Of those thirty states, five to seven states reported the majority of the stormwater needs.

Q: What is the minimum and maximum SRF loan, general time frame to repay and interest rate? Are these available for smaller cities?

A: The SRF loans are available to small communities. Some States have special programs within the SRF allotment formulas and priority lists for small communities. SRF loans can be up-to-20 years in length. The interest rate varies from State-to-State. It is below the market rate. The States set their own interest rate and sometime they will have even lower interest rates for certain high priority projects. You can check all this out at the SRF Website, which is at <http://www.epa.gov/owm/cwfinance/index.htm>. It gives you the links to all the State programs.

Q: Nikos mentioned that 319 grants can be used for a wide range of stormwater projects. We've actually been given guidance from EPA that 319 money can no longer be used for projects that are covered by Phase II - as they're now considered point sources. Can you please clarify?

A: There are a lot of misconceptions about the relationship between the 319 grant program and the Phase I and Phase II stormwater program. If the project is specifically mentioned in your permit, then it is no longer eligible for 319 funding. The specific language used by EPA is:

Polluted runoff from MS4s may be funded under either the CWSRF's §212 eligibility or its §319 nonpoint source eligibility...Additionally, if a community has a draft or final permit, activities may be funded under the program's nonpoint source (§319) authority if the activity is not specifically required by a draft or final NPDES permit. This includes both public and private activities (see <http://www.epa.gov/owm/cwfinance/cwsrf/wetweather.pdf> for full text)

The Phase I and II permits are very broad and general. In fact, most of the phase II are State-wide general permits for all the MS4. They don't have any specific projects mentioned. In almost every case that we can think about, those projects would be 319 eligible. Generally, it is a misperception that just because the project is an MS4, that it is not eligible for 319 funding. EPA is funding projects every day that are in the MS4 areas.

States may have more restrictive rules governing how they allocate 319 funds. Those decisions are made at the State level. So, it would be possible that the State may have different qualifications or priority settings.

Clarification: The 2003 319 Grant Guidance (mentioned in a previous question/answer) has detailed information about the funding of projects in regulated MS4s. When a project or activity is required by the MS4 permit, it is no longer eligible for funding under the 319 Grant program. For instance, MS4 permits require that communities identify and map their stormwater outfalls. Because this activity is required by the permit, it would not be eligible for funding under the 319 Grant program. Projects and activities that are not required by the MS4 permit, may be eligible for 319 Grant funding.

Q: Is the SRF program also eliminating Category VI-D? Will we then have no Cat VII-D or will Cats VII-E - Cats VII-K be "renumbered?"

A: First part: We are coordinating with the SRF program on the CWNS 2008 category changes. The SRF program with feedback from the SRF community will decide the way they will handle the changes. There may be a direct category change or a cross-walk. Second part: All the VII-D urban non-point

source needs will be moving to one of the four stormwater sub-categories with the checkbox indicating that it is a non-regulated area. There are no plans to renumber the other Category VII subcategories.

Q: Will the EPA CWNS staff be contacting the state CWNS coordinator prior to moving category VII-D needs to category VI?

A: Yes, we will be contacting you prior to moving category VII-D needs to category VI. As many State CWNS Coordinators know, we are in the process of data migration right now, and we are interacting with the States. So, State CWNS Coordinators will soon see something about the category VII-D moving to category VI.

Q: Considering the new-subcategories, how will needs from CWNS 2004 be migrated correctly?

A: EPA has been looking at all the stormwater documents that were submitted in 2004 and have been able to classify a good percentage of the needs into the category VI sub-categories based on the documents. Others were not able to be classified and they will move into a general category VI. For 2008 onward, that category VI will only be legacy data that wasn't able to be reclassified.

Section II: The following questions were asked during the Web Seminar, and the presenters did not have time to answer them. Written answers are provided below.

Q: Please go over the various sub-categories that come under category VI.

A: The four sub-categories are:

VI-A: Traditional Stormwater Conveyance Infrastructure, includes the planning, design, and construction/purchase costs associated with pipes, inlets, road side ditches, etc.

VI-B: Traditional Stormwater Treatment Systems, includes the planning, design, and construction/purchase costs associated with wet ponds, dry ponds, manufactured devices, etc.

VI-C: Green Infrastructure/Low Impact Development Stormwater Treatment Systems, includes the planning, design, and construction/purchase costs associated with bioretention, constructed wetlands, permeable pavement, rain gardens, green roofs, cisterns, rain barrels, vegetated swales, restoration of riparian buffers and flood plains, etc.

VI-D: General Stormwater Management, includes the planning, design, and construction/purchase costs associated with such things as GIS and tracking systems and equipment (e.g. street sweepers, vacuum trucks, etc.). This category may also include the planning, design, and construction/purchase costs associated with certain aspects of a community's stormwater education program (such as setting up a stormwater public education center, building a traveling stormwater education display). Finally, this category may include the costs of developing your stormwater management program.

Q: Will funding be allowed to fund septic tank cleanup/ sewer installation if there is a direct problem with water quality due to seepage?

A: Yes, funding for needs related to decentralized wastewater treatment (onsite wastewater treatment systems and clustered systems) is captured under category XII of the needs survey. For more information, see the data collection and submission guidance for entering Decentralized Wastewater

Treatment System needs and costs at <http://www.epa.gov/cwns/cwns2008.htm> under Resources and the materials related to the October 3 web seminar on documenting decentralized needs at <http://www.epa.gov/cwns/webseminar.htm>.

Q: Is sewer separation accepted?

A: Yes. Sewer separation is considered a wastewater treatment need and is reported in category V: Combined Sewer Overflow Correction.

Q: How can a traditional conveyance project address water quality since needs must be water quality related? Could you please give some examples of how a traditional conveyance project would be considered a water quality project?

A: These terms can sometimes be a bit misleading. Stormwater management includes conveyance infrastructure and needs for such infrastructure may be included in the Needs Survey. We consider these projects "Clean Water Act projects" and thus "water quality" projects, even though, in a strict sense, they may not involve treatment to improve water quality. Flood control projects, such as building dams, are not considered Clean Water Act projects and would not be included in the Needs Survey.

Q: If quantity/conveyance measures are part of a SWIPP are they automatically eligible?

A: A project does not have to be in the municipal Stormwater Management Plan (SWMP) to be eligible for the Clean Watersheds Needs Survey. Anything you are doing to address stormwater management is potentially eligible.

Q: Slide 96: In which category do you put the design costs associated with the stormwater project? Is it included with the planning or with the traditional stormwater category?

A: The costs for the design of the stormwater project should be in the category of the resulting project. If the design costs are for a wet pond the costs should be reported in the sub-category Traditional Stormwater Treatment Systems.

Q: How does the local MS4 get its data to the State? Is there a standardized survey form?

A: Each state has its own system for collecting data from municipalities and facilities. There are three general methods that states use.

- 1) The CWNS coordinator works with State stormwater staff to collect as much CWNS data as possible from their files.*
 - 2) The CWNS coordinator or Stormwater coordinator contacts the municipality via phone, e-mail, mail, etc. to collect the data. Some states develop a standard survey that they send to all MS4s.*
 - 3) The CWNS coordinator provides the municipality direct access to the CWNS data entry system to update and submit data electronically.*
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Q: Would you please tell your estimate regarding how much time is needed to enter the information to the online database?

A: According to our last Information Collection Rule (ICR), EPA estimates about 1.5 hours per facility. EPA received feedback in 2006 from several state CWNS Coordinators indicating that this amount is on

target. In addition, there is some additional effort when coordinators interact with local facilities to get the data in the survey.

Q: What is SRF? How do you apply for SRF funding?

A: SRF is the State Revolving Fund. There is a Drinking Water and a Clean Water State Revolving Fund. In this presentation, we are referring only to the Clean Water State Revolving Fund. Key features of the program include:

- *Low Interest Rates, Flexible Terms—Nationally, interest rates for CWSRF loans average 2 percent, compared to market rates that average 4.5 percent. For a CWSRF program offering this rate, a CWSRF funded project would cost 20 percent less than projects funded at the market rate. CWSRFs can fund 100 percent of the project cost and provide flexible repayment terms up to 20 years.*
- *Significant Funding for Nonpoint Source Pollution Control and Estuary Protection—CWSRFs provide more than \$370 million in 2006 to control pollution from nonpoint sources and for estuary protection, more than \$2.4 billion to date.*
- *Assistance to a Variety of Borrowers—The CWSRF program has assisted a range of borrowers including municipalities, communities of all sizes, farmers, homeowners, small businesses, and nonprofit organizations.*
- *Partnerships with Other Funding Sources—CWSRFs partner with banks, nonprofits, local governments, and other federal and state agencies to provide the best water quality financing source for their communities.*

The SRF program varies from state to state. For more information, visit <http://www.epa.gov/owm/cwfinance/cwsrf/index.htm>.